

EXHIBIT 11

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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

FRANK HALL, Individually and on)	No. 3:18-cv-01833-FLW-TJB
Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	
)	STIPULATION REGARDING
vs.)	MERITS DEPOSITIONS AND THE
)	CLOSE OF FACT DISCOVERY
JOHNSON & JOHNSON, et al.,)	
)	
Defendants.)	
_____)	

This Stipulation Regarding Merits Depositions and the Close of Fact Discovery is entered into between Lead Plaintiff and Defendants (collectively, the “Parties”).

WHEREAS, in light of the complex nature of this case, both Lead Plaintiff and Defendants believe it is necessary to take more than 10 merits depositions;

WHEREAS, the Parties have met and conferred extensively, and have reached an agreement on the number of merits depositions the Parties can take without leave of Court and a fact discovery schedule to accommodate those depositions;

NOW, THEREFORE, the Parties hereby stipulate and agree, subject to the Court's approval that:

1. Lead Plaintiff may take up to 30 depositions of current and/or former Johnson & Johnson employees without leave of Court;
2. Lead Plaintiff may take up to 70 hours of merits depositions of third parties without leave of Court;
3. Defendants may take up to 15 merits depositions without leave of Court; and
4. The close of fact discovery shall be extended from October 15, 2021 until January 31, 2022.
5. The remaining deadlines will be set consistent with the time frame agreed upon by the parties and as outlined in the Joint Discovery Plan. *See* ECF No. 67 at ¶17.

Dated: July 2, 2021

Respectfully Submitted,

/s/ Jack N. Frost, Jr.

Jack N. Frost, Jr.

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Dated: July 2, 2021

Respectfully Submitted,

/s/ James E. Cecchi

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*Lead Counsel for Plaintiff San Diego County
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IT IS SO ORDERED.

Dated: 7/6/2021



**HON. TONIANNE J. BONGIOVANNI
U.S. MAGISTRATE JUDGE**